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Kathy Raskind
(Typed or printed name of person mailing paper or fee)
Kathy Raskind
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of

October 13, 2003

Trademark Application Serial No. 78/206,862
For the mark **KAYLA KLEEVAGE**
Published in the Official Gazette on
TM368 on October 7, 2003

Kathryn Shaffer, Opposer
v.
Kleevco Productions, Applicant



10-14-2003

U.S. Patent & TMO/TM Mail Rpt Dt. #22

NOTICE OF OPPOSITION

Box TTAB FEE
Commissioner for Trademarks
2900 Crystal Drive
Arlington, VA 222-2-3513

Commissioner:

Opposer, Kathryn Shaffer appearing by and through her attorneys, believes she will be
damaged by registration of the mark shown in U.S. trademark application Serial No. 78/206,862
in International Class 41 and hereby opposes the same.

10/20/2003 TSMITH 00000158 78206862

01 FC:6402

300.00 OP

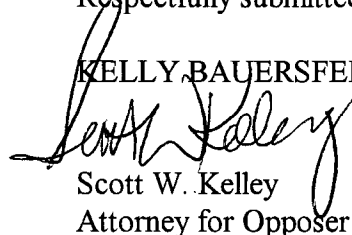
The grounds for opposition are as follows:

1. Opposer, Kathryn Shaffer is an individual having an address of 3230 East Flamingo Road, #324, Las Vegas, Nevada 89121.
2. Opposer, Kathryn Shaffer provides live adult entertainment in the form of pictures and performances via the Internet under the name KAT KLEEVAGE, as shown in attached Exhibit A.
3. Since at least as early as June of 2000, Opposer has provided live adult entertainment pictures and performances via the Internet and made personal appearances as a celebrity adult entertainer. On September 8, 2003 Opposer filed a U.S. trademark application for the mark KAT KLEEVAGE..
4. The term KLEEVAGE is merely an informal alternative spelling of the term "cleavage". As shown in Exhibit B, the term "cleavage" is defined in *The American Heritage Dictionary, Second College Edition*, as "the separation between a women's breast".
5. As shown in Exhibit C, the term "cleavage" is frequently used in association with adult entertainment web-sites. As shown in Exhibits D and E, the terms "Kleevage" and "Kleavage" are also used in association with various adult entertainment web-sites other than those of Opposer and Applicant. Exhibit F are print-outs of various web-sites acquired by Opposer illustrating the use of the terms "Kleevage" and "Kleavage" by those other than Opposer and Applicant in association with adult entertainment web-sites. Such usages include "Kelly EE Kleevage", "Karen Kleavage" and "Kathi Kleavage".
6. Opposer asserts that the terms "cleavage", "kleevage" and "kleavage" are all descriptive in the mind of the consuming public of women's breasts, and particularly large breasts in the XXX and adult entertainment industry.
7. Opposer believes that the registration of the mark KAYLA KLEEVAGE by Applicant is likely to harm Opposer and others who use the term KLEEVAGE or its phonetic equivalent.

WHEREFORE, Opposer Kathryn Shaffer, prays that this Opposition be sustained and that registration of Application Serial No. 78/206,862 be refused.

Respectfully submitted,

KELLY BAUERSFELD LOWRY & KELLEY, LLP



Scott W. Kelley
Attorney for Opposer

SWK/kr
6320 Canoga Avenue, Suite 1650
Woodland Hills, California 91367
(818) 347-7900

Kat Kleevage

[Home](#)

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[Videos](#)

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New *Signed, Sealed and Delivered* series now here.

Check it out - [HERE](#)

**As Seen on Howard Stern, now on tour in Manhattan, NY.
through May 11th.**

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Second College Edition

The
American
Heritage
Dictionary



EXHIBIT B


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cleavage

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[Directory Results](#)
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Searched the web for **cleavage**. No entries for clicks on results.search took **0.21** seconds

related searches

[cleavage pics](#)
[free cleavage pics](#)
[i love my cleavage](#)
[major cleavage](#)
[free cleavage pictures](#)
[jadespanties](#)
[sensual pictures](#)
[teen cleavage pics](#)
[stocks](#)
[legs in stockings](#)

web sites | provided by Google

Results 1-10 of about **829,000****Mega Cleavage** - your free resource for sensual teen pictures

... Kate Winslet Natalie Portman. TEEN PLANET. SOFT TEEN ASS. CRAZY CLEAVAGE. DAILY TEENS. TEASIN CUTIES. WILD TEEN 4PLAY. ALL LINKS. A+Bikini A ...

<http://www.megacleavage.com/> - Cached
Major Cleavage

Main Menu. Homepage. Photos. Contact. Links. Links. Link Exchange.

Hit the refresh button to see more photos or check out these: Warning ...

<http://www.majorcleavage.com/> - Cached
I LOVE MY CLEAVAGEWelcome to I Love My **Cleavage**! ... Good for you! And if you have **cleavage** and you love it—and have a website—well, gosh darn it, join my clique! ...
<http://www.wondergirl.org/cleavage/> - Cached
Natural breast enhancement, male penis enlargement, and more!Natural Breast Enhancement**Cleavage** is the all-natural breast enhancement productas seen on TV! ... Product Index, **Cleavage** Kit. **Cleavage** 6 Capsules. **Cleavage** 4 Cream. ...

Category: Top/Shopping/Health/Reproduction and Sexuality/Breast Enhancement/Supplements

<http://www.cleavageonline.com/> - Cached
Cleavage Creation - Page 1**Cleavage** Creation. The obvious first step in creating **cleavage** is

complete elimination of chest hair. Again my recommendation is ...

<http://www.draag.com/cleavage1.html> - Cached
Cleavage: Introduction**Cleavage**: Introduction. Compared with protists, metazoans represent a huge change in the organization of animals: they are multicellular. ...
http://worms.zoology.wisc.edu/frogs/cleavage/clea_intro.html - Cached
Crazy Cleavage - All your **cleavage** needs in one website!

... Go here to see this cute 18 year old girl take off her bra and then the rest of her

clothes!! All Your **Cleavage** Needs In One Website. ... Mega **Cleavage**. Busty Teens. ...
<http://crazycleavage.nnfree.com/> - Cached
Mineral Gallery - the property of **CLEAVAGE****WHAT IS CRYSTAL CLEAVAGE?** MINERALS ... Crystal **cleavage** is a smooth break producing what appears to be a flat crystal face. Here are a few rules about **cleavage**. ...
<http://mineral.galleries.com/minerals/cleavage.htm> - Cached
Teen Cleavage - The Crevice We Love... **Cleavage** Of the Month. ... Submit your **cleavage** shots: UPLOAD: Upload, upload

!!! webmaster@teencleavage.com. All pictures have been voluntarily ...

<http://www.teencleavage.com/> - Cached

No Title

<http://cleavage.fan-atic.net/> - Cached

Result Page: [1](#) [2](#) [3](#) [4](#) [5](#) [6](#) [7](#) [8](#) [9](#) [10](#) [Next](#)

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cleavage

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search took **0.21** seconds

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related searches

[kayla kleeavage](#)
[kaylakleeavage](#)
[kerry marie](#)
[kayla](#)

web sites | provided by Google

Results **1-10** of about **20,500**

Kayla Kleeavage Official Website

... 1999 All images and text - Kleevo All rights reserved - No use without written permission Kayla **Kleeavage**, Kleevo and John Port Productions are trademarked. ...
<http://www.kaylakleeavage.com/> - [Cached](#)

Kat Kleeavage - Pom and Magazine Star

Enter Kat **Kleeavage**. Kat **Kleeavage**. Email katkleeavage@hotmail.com. Parents please note: If you have children who have access to the internet ...
<http://www.katkleeavage.com/> - [Cached](#)

Kayla Kleeavage

Kayla **Kleeavage**. ... Click here for next Kayla **Kleeavage** hardcore titty fuck gallery! photos courtesy of www.scoreland.com. linsey dawn mckenzie.
<http://www.huge-natural-tits.net/kayla-kleeavage/> - [Cached](#)

kayla kleeavage - Interviewed!!

kayla **kleeavage** interviewed. MEET kayla **kleeavage**. ... KAYLA **KLEEVA**GE: Yeah, we had a good time. We did a three-girl, and we had big strap-ons dildos. ...
<http://www.sexy-naked-models.com/kayla-kleeavage.html> - [Cached](#)

kayla kleeavage

Kayla **Kleeavage**. Solo nude pics of Kayla **Kleeavage**, as she has never been seen before! - EXCLUSIVE PORN SHOTS. ... ENTER KAYLA **KLEEVA**GE BIG BOOB GATEWAY >. ...
<http://www.naked-sexy-models.com/kayla-kleeavage.htm> - [Cached](#)

Footdivas.com Welcome to our free preview

Come see gorgeous girls teasing you with their sexy stockinged or bare feet and toes. These girls just love feet and love to have guys at their feet. ...
<http://www.kathikleeavage.com/> - [Cached](#)

Kayla Kleeavage at Adult Fan Clubs

Kayla **Kleeavage**. ... aliases 04/20/???? Racine, Wisconsin 11 Caucasian Blonde 95 lb -?? 5'7" No Data None None <http://www.kleeavage.com>. ...
<http://www.starlitepublishing.com/Final/Dir/K/BAKK.html> - [Cached](#)

Kayla Kleeavage

kayla **kleeavage**. WARNING: ADULTS ONLY! ... Kayla **Kleeavage** eats every drop of your cum. [kaylakleeavage04.jpg](http://www.kaylakleeavage04.jpg). kayla **kleeavage** best white / black fuck ever ->. ...
<http://www.xlgirls.net/kayla-kleeavage/> - [Cached](#)

Kayla Kleeavage movies DVDs - Kayla Kleeavage videos

Kayla **Kleeavage** movies DVDs and Kayla **Kleeavage** Videos. Cheap Kayla **Kleeavage** movies on DVD. Anal Kayla **Kleeavage** DVDs! Kayla **Kleeavage** movies. ...
<http://www.allvideostore.com/kayla-kleeavage/> - [Cached](#)

kayla kleeavage

kayla **kleeavage**. Kayla **Kleeavage**'s Stats: Measurements: 36HH-24-34 Height

<http://search.iwon.com/commerce/multisearch.jsp?searchfor=kleeavage>

EXHIBIT D

0/7/2003

5' 7" Birthday: April 20th Home Town: Houston, TX. Kayla ...
<http://www.nude-sexy-models.com/kayla-kleevage.html> - Cached

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kleevage

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kleeavage

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search took **0.19** seconds

web sites | provided by Google

Results **11-20** of about **20,500**What Katie Did

Kathi Kleeavage. If you're a regular reader of stocking and girdles forums you won't have been able to miss Kathi **Kleeavage** over the last few years. ...

http://www.stockingtalk.co.uk/Kathi_Kleeavage.htm - Cached
Adult Search Engine: Kayla+Kleeavage

Search Results Your search for Kayla+**Kleeavage** found the following documents (of 6415 documents searched): Displaying documents 1-10 of 625, with best matches ...

<http://www.search-engine-adult.com/cgi-bin/search/search.pl?q=Kayla%2BKleeavage> - Cached
Kayla Kleeavage DVD Movie, VHS Video, Movie Trailer and Biography ...

Kayla Kleeavage: Your source for Kayla **Kleeavage** DVD Movie, VHS Video, Movie Trailer and Biography from Excalibur Films; Kayla **Kleeavage** hardcore, Kayla **Kleeavage** ...

http://search.excaliburfilms.com/pornlist/starpgs/Kayla_Kleeavage.htm - Cached
Kayla Kleeavage

Kayla Kleeavage. Photos from big boob www.scoreland.com boobzilla! ... kayla **kleeavage** sensational tits join big boob party here. over 500 + pictures and videoclips. ...

<http://kaylakleeavage.hugetit.us/> - Cached
No Title
<http://kayla-kleeavage.boobweb.com/big-tit-porn-stars/kayla-kleeavage/> - Cached
kleeavage cum beastality porn animal monkeysex - Beauty & Beast - ...

kleeavage cum beastality porn animal monkeysex - beastality site beastality 1on1tv com Russian mail order bride picture farm animal FREE FARMANIMAL XXX sex ...

<http://gaysexpass.com/kleeavage-cum-beastality-porn-animal-monkeysex.html> - Cached
rent adult video at Video Takeout 1

... DVD Porn: kayla **kleeavage**. 1. ... All big tits! Covergirl Kayla **Kleeavage** swings her massive 42GGG tits! You wont believe the huge tits swaying as pussies get reamed! ...

<http://www.videotakeout.com/dvd/porn/star/kayla-kleeavage.html> - Cached
Kayla Kleeavage

Kayla Kleeavage. Kayla **Kleeavage** Kayla **Kleeavage** rides a Harley Davidson Dyna Low Rider when she has the time. ... **CLICK HERE!** Kayla **Kleeavage**. ...

<http://www.boobs-stars.com/kayla-kleeavage/> - Cached
kleeavage - Beauty & Beast - Beastality ANIMAL COCKS free nude ...

kleeavage - barnyard sexanimals free beastly sex downloads farmanimals free beastly porno pics thumbs sex animals xxx free fuck horse dog monkey free beastality ...

<http://horsepregnantteen.com/kleeavage.html> - Cached
Kayla Kleeavage DVDs and Videos at Search Extreme

Kayla Kleeavage on Search Extreme: Detailed information about Kayla **Kleeavage** and breakdowns of all scenes in her videos, movies and DVDs. ...

http://www.searchextreme.com/actordetails/Kayla_Kleeavage/49280306841/ - Cached
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kleevage

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kleavage

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search took **0.30** secondsDid you mean: **kleevage**?

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Results 1-10 of about **406****Big Tits... You are moments away from the Net's BEST boob site!****WARNING !!! ADULTS ONLY !!!** This Website contains sexually-oriented adult content which may include visual images and verbal descriptions ...<http://www.kleavage.com/> - Cached**Kayla Kleavage free pics Large Breasts**Kayla **Kleavage** - alyssa alps pics, sarena lee pics, blake mitchell, Kayla **Kleavage**, Kayla **Kleavage**, chealse charms, dita Rocki Roads, Rocki Roads, kayla ...<http://www.privatepornstars.com/bigboobs/kayla1/> - Cached**Kleavage**Lori Larkin's. **Kleavage** Kit. Being quite slender and with very little body fat, I always had a great deal of difficulty creating a believable bustline. ...<http://home.bresnan.net/~lorilarkin2/kleavage.htm> - Cached**Kat Kleavage DVD Movie, VHS Video, Movie Trailer and Biography ...**Kat **Kleavage**: Your source for Kat **Kleavage** DVD Movie, VHS Video, Movie Trailer and Biography from Excalibur Films; Kat **Kleavage** hardcore, Kat **Kleavage** nude ...http://search.excaliburfilms.com/pornlist/starpgs/Kat_Kleavage.htm - Cached**AndyMon Productions: Home of the Kleavage Krew**

Ecommerce Solution • Free Web Space • Free Web Site • Web Hosting, ...

<http://www.andymon.50megs.com/> - Cached**Karen Kleavage**

... skirt and arm hoes 6.matching garder 7.no hands (burnt off) 8.no feet

9.one leg Click here for the karen **kleavage** picture gallery! ...<http://www.geocities.com/SunsetStrip/Loft/4794/Karen.html> - Cached**KKKW Home**... Then I tried it on. My inner Klingon was released. I immediately knew any costume I built had to have Klingon **Kleavage**. ... **Kleavage** How To Back to the internet. ...<http://www.geocities.com/Area51/Rampart/9133/> - Cached**Kayla Kleavage huge busted adult model monster tits**Kayla **Kleavage** huge busted adult model monster tits. A beautiful women with huge bigger than life tits. click here.<http://www.boobsites.com/site/kayla.html> - Cached**Kayla Kleavage at XXX Movie Pro, VoD (Adult Video On Demand) DivX ...**

... assume all risk regarding legality of these materials in my location."

Kayla **Kleavage**. Welcome to Kayla **Kleavage**'s movie listing page. ...http://www.xxxmoviepro.com/star/k/kayla_kleavage.html - Cached**Evol Kleavage ... is great**Welcome to the. Homepage. Welcome to the homepage of Evol **Kleavage** (the greatest band in the world). Below, you will find links to ...<http://168.216.205.20/Usr8/Rpostlethwait/ekmain.htm> - Cached

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Results **11-20** of about **405****BoobArena.com - Kayla Kleavage**

Please refer any problems with this web site to the webmaster. All copy and graphics are the sole copyright of BoobArena unless otherwise noted. ...

http://www.boobarena.com/models/kayla_kleavage.html - Cached**BOOKMARXXX - Search Results for kayla kleavage**Search Results 3 categories and 9 links found for kayla **kleavage**. ...<http://www.bookmarxxx.com/search.cgi?s=kayla+kleavage> - Cached**Porn Bombs with Kayla Kleavage**

ENLARGE YOUR PENIS! PENIS ENLARGEMENT PATCH ADD 3 - 4 INCHES GROWTH - GUARANTEED!

IT'S NEW, IT'S PROVEN, IT WORKS CLICK HERE FOR MORE INFO. ...

http://www.tgpfriendly.com/users/bombs/babes/kayla_kleavage.html - Cached**Porn Bombs with Kayla Kleavage**... KAYLA **KLEAVAGE** FREE NUDE PICS. NEXT KAYLA **KLEAVAGE** PHOTOS Amateur Pics500 Free Amateur Pics Search for more Kayla **Kleavage** pics. Freeones. ...http://www.tgpfriendly.com/users/bombs/babes/kayla_kleavage_1.html - Cached**Masturbating Mid Life Mamas DVD VHS Movie Starring: Kat Kleavage ...**Masturbating Mid Life Mamas Movie DVD and VHS Video Starring: Kat **Kleavage**, Danielle

King, Tabitha H., Victoria, April, Dallas, Jessica Wild, Fauna, Sheryl Lynn ...

http://search.excaliburfilms.com/moviepgs/vhs_103775V1.htm - Cached**Kat Kleavage at XXX Movie Pro, VoD (Adult Video On Demand) DivX(...**

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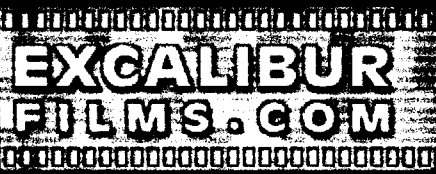
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Kelly EE Kleeavage 21st Birthday Gang Bang

Starring:

Rated: XXX
Ships: Check
Inventory
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Kelly EE Kleeavage 21st Birthday Gang Bang DVD Movie

Synopsis:

Customer Rating: ★★★★★

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Poor Great

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Mega Tits #2

Starring:

Gaynor

Rated: XXX
Ships: Check
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Synopsis:

Customer Rating: ★★★★★

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Poor Great

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Real Big Tits #12

Starring:

Friday

Rated: **XXX**

Ships: **Check**

Inventory

Run Time:

Released:

NGV

Stock:

Format: **DVD**

Number of Discs:



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Real Big Tits #12 DVD Movie

Synopsis:

Customer Rating: ★★★★★

Rate Real Big Tits #12

Poor

Great

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Starring: Jessica Jewel Angel Hart Crystal Dawn Melanie Stone Azlea Christina Angel Kimberly Jade

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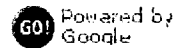


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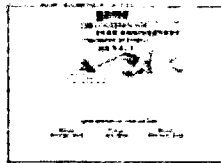


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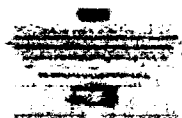
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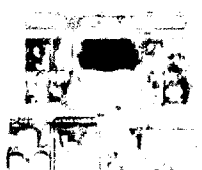
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Lori Larkin's

Kleavage Kit



Being quite slender and with very little body fat, I always had a great deal of difficulty creating a believable bustline. I have heard numerous stories of girls using various types of tape and in the process blistering and/or literally tearing their skin. With this in mind, I have developed a very simple little device that works wonders to create the appearance of cleavage. Now when I attend gender conventions I am constantly being ask how long I have been taking hormones when in fact, I never have. After seeing and trying it, several of my friends have encouraged me to market it as it is easy to use, adjustable, and inexpensive. It uses two hand cut pieces of leather and attaches with surgical glue. Here are a few features:

- > Laces together making it adjustable and therefore quite comfortable
- > Reusable, just clean off the residual glue and it's ready to use again
- > Hides easily in your bra and breast forms
- > Much safer and effective than duct tape
- > Comes with everything you need

I've gotten feedback from a few girls that they have difficulty getting the glue off their skin so I've come up with a special medical remover to help. You just put a little on a cotton ball or clean rag and the glue comes right off.

It is not my intention to get rich or rip anyone off. We all have been down that road. I would however like to recover my costs and the time it takes me to cut them out. Actually the most expensive thing is the surgical glue. I've seen it sold everywhere from \$30-\$40 for a 4oz. bottle. Prices are now \$30 for the kit and \$3 shipping for a total of \$33. If you want the special glue remover please add \$10 for a total of \$43. Please include an additional \$10 for international shipping. Additional bottles of the adhesive are \$20 and additional remover is \$10.

At this point in time I'm only able to accept payment in the form of checks and money orders and I'll have to hold the checks long enough for them to clear. If there is enough demand I'll try and get set up to accept credit card orders. If you have any questions or if you're ready to order a set please e-mail me at lori@larkin.com



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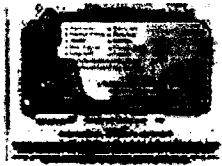
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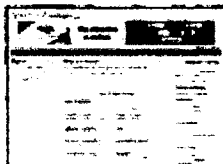
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Yahoo! Groups : highheelsandnylons Messages : 132-161 of 938

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ns.felk.cvut.cz:8000/squid/days/hosts/proxy.1151.total-... [Cached](#) [Site info](#) 


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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

KATHRYN SHAFFER,)
)
 Opposer,)
)
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)
 KLEEVCO PRODUCTIONS,)
)
 Applicant.)
_____)

October 13, 2003



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Enclosed herewith are the following documents for filing in the above-identified opposition proceeding.

- 1) NOTICE OF OPPOSITION and Exhibits A-F (submitted in triplicate);
- 2) Check in the amount of \$300.00 to cover the applicable fee.
- 3) Return receipt postcard.

KELLY BAUERSFELD LOWRY & KELLEY, LLP

Scott W. Kelley

Scott W. Kelley, Reg. No. 30,762
Kelly Bauersfeld Lowry & Kelley, LLP
6320 Canoga Ave., Suite 1650
Woodland Hills, CA 91367
Tel: (818) 347-7900
Fax: (818) 340-2859